

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

WILLIE M. TURNER,)	
)	
Plaintiff,)	Civil Action No. 1:18-CV-01955-DCN
)	
v.)	Judge: Hon. Donald C. Nugent
)	
CBC NATIONAL BANK,)	Report of Parties' Planning Meeting
)	Under Fed. R. Civ. P. 26(f) and L.R.
Defendant.)	16.3(b)
)	

1. Pursuant to FED. R. CIV. P. 26(f) and LR 16.3(b), a meeting was held on October 3, 2018, and was attended by:

Marwan R. Daher counsel for plaintiff Willie Turner

Keith S. Anderson counsel for defendant CBC National Bank

2. The parties will exchange the pre-discovery disclosures required by FED. R. CIV. P. 26(a)(1) and the Court's prior order such disclosures by **October 31, 2018**.

3. The parties recommend the following track:

<input type="checkbox"/> Expedited	<input checked="" type="checkbox"/> Standard	<input type="checkbox"/> Complex
<input type="checkbox"/> Administrative	<input type="checkbox"/> Mass Tort	

4. This case is suitable for one or more of the following Alternative Dispute Resolution (ADR) mechanisms:

<input type="checkbox"/> Early Neutral Evaluation	<input checked="" type="checkbox"/> Mediation	<input type="checkbox"/> Arbitration
<input type="checkbox"/> Summary Jury Trial	<input type="checkbox"/> Summary Bench Trial	
<input type="checkbox"/> Case not suitable for ADR		

The parties will advise the Court on ADR at the Status Conference.

5. The parties do/ **do not** consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

- **The number of calls placed by CBC to Plaintiff's cell phone**
- **Whether CBC used an automatic telephone dialing system (ATDS) to place the calls**
- **Whether CBC used an artificial or prerecorded voice messages**
- **Whether calls were placed to Plaintiff with Plaintiff's prior express written consent**
- **Whether Plaintiff revoked his consent to receive calls from CBC by any reasonable means**
- **The nature of discovery will be Plaintiff's call records, Defendant's business records, the testimony of the parties, and the testimony of third-party witnesses, if any.**

(b) The parties (indicate one):

_____ agree that there will be no discovery of electronically-stored information;
or

X have agreed to a method for conducting discovery of electronically-stored information and will produce documents in PDF format; or

_____ have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District Ohio Local Rules)

(c) Non-Expert Discovery cut-off date: **April 30, 2019**

(d) Plaintiff's (or party with the burden of proof on an issue) expert report due date: **June 15, 2019.**

Defendant's (or party without the burden of proof on an issue) due
date: **July 15, 2019**

Expert Discovery cut-off date: **September 15, 2019**

7. Recommended dispositive motion date: **October 15, 2019**

8. Recommended cut-off date for amending the pleadings and/or adding additional
parties: **November 16, 2018**

9. Recommended date for a Status Hearing: **On or after May 15, 2019.**

10. Other matters for the attention of the Court:

N/A

Respectfully submitted this 16th day of October, 2018,

s/Marwan R. Daher
Marwan R. Daher
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